289 East Water Tower Drive
Monon, IN 47959
(219) 253-2000

December 21, 2021

Josh Neff, Chief
Medium & Heavy-Duty Vehicle Defect Division
Office of Defects Investigation

Re: DP21-004

Dear Mr. Neff:

Vanguard National Trailer Corporation has never installed side underride guards on any of its OEM trailers, and does not offer the option for side underride guards for any of its trailers. To this date no Vanguard customer has requested the option.

Furthermore, Vanguard does not do business with or have any contact with the following companies:

http://www.angelwingskirts.com/

https://www.trailerguards.com/

Responding to the specific questions:

1. State by model year the number of subject vehicles Vanguard has manufactured for sale or lease in the United States since 2006. Include by model year the number of subject vehicles which were manufactured by Vanguard with side underride guards as original equipment.

Vanguard National Trailer Corporation has never installed side underride guards on any of its OEM trailers. Vanguard records indicate 141,840 trailers sold through November 2021.

2. State the current or estimated number of Vanguard subject vehicles still in service for all model years.

Vanguard National Trailer Corporation has never installed side underride guards on any of its OEM trailers. We do not have anyway of tracking how many of the trailers that we have sold are still in operation.

3. Please report Vanguard current percent of the subject vehicle market share.

0% - Of trailers with side underride guards installed.

Our market share of total semitrailers varies between 6%-8%.

4. Provide a brief summary of any and all reports, claims, or other notices received by Vanguard, or of which Vanguard is otherwise aware, which relate to, or may relate to, the alleged defect in the subject vehicles or vehicles equipped with side underride guards.

See Attachment title at end of this document…NOTE: Vanguard was released from any liability in this case (Hoaglin).

5. Does Vanguard currently offer side underride guards as standard or optional equipment? If yes, is it a Vanguard design or from another supplier? If from another supplier, identify the supplier and provide their contact information.

Vanguard does not offer the option for side underride guards for any of its trailers. To this date no Vanguard customer has requested the option.

6. Produce copies of all installation, service, warranty, and other documents that relate to, or may relate to, the subject component in the subject vehicles.

Vanguard National Trailer Corporation has never installed side underride guards on any of its OEM trailers, and does not offer the option for side underride guards for any of its trailers. To this date no Vanguard customer has requested the option.

7. Provide a brief summary of all assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations that relate to, or may relate to the subject component that have been conducted, are being conducted, are planned, or are being planned by, or for, Vanguard.

Vanguard has not conducted and does not plan on conducting any assessments, analyses, tests, test results, studies, surveys, simulations, investigations, inquiries and/or evaluations that relate to, or may relate to side underride guards.

8. Anglewing is one aftermarket manufacturer of side underride guards. Please assess the compatibility of this product with Vanguard trailers. See the following link for additional information: http://www.angelwingskirts.com/

After visiting the website http://www.angelwingskirts.com/; Vanguard has determined that there is not enough information to know or determine the answers for question (8) subparts a through i.

9. Safetyskirt is one aftermarket manufacturer of side underride guards. Please assess the compatibility of this product with Vanguard trailers. See link for additional information: https://www.trailerguards.com/

After visiting the website https://www.trailerguards.com/; Vanguard has determined that there is not enough information to know or determine the answers for question (9) subparts a through i.

10. Furnish Vanguard's assessment of the following in today's transportation system:

Due to Vanguard's answer to question number (7), we do not have information to know or determine the answers for question (10) subparts a through e.

After some discussion with Mr. Seymour from NHTSA about his understanding of side underride installation, we can say that we do not recommend cutting or drilling any structural components of the standard trailer design, and that adding weight and cost the semi-trailer has a negative economic impact to Vanguard's customers.

Regards,

Mark Roush
Vice President of Engineering

2018-07-31-FNOL-Complaint-Hoaglin.pdf included as attachment to email.